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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE:

GENERAL MOTORS COPR., *et al.*

Debtors.

Chapter 11

Case No. 09-50026 (REG)

(Jointly Administered)

**LIMITED OBJECTION OF KOCH ENTERPRISES, INC. TO THE NOTICE OF
(I) DEBTORS' INTENT TO ASSUME AND ASSIGN CERTAIN EXECUTORY
CONTRACTS, UNEXPIRED LEASES OF PERSONAL PROPERTY, AND
UNEXPIRED LEASES OF NONRESIDENTIAL PROPERTY AND (II) CURE
AMOUNTS RELATED THERETO**

Koch Enterprises, Inc. ("Koch"), by and through its undersigned counsel, hereby files its Limited Objection (the "Limited Objection") to the Notice of (I) Debtors' Intent to Assume and Assign Certain Executory Contracts, Unexpired Leases of Personal Property, and Unexpired Leases of Nonresidential Real Property and (II) Cure Amounts Related Thereto (the "Notice") served upon Koch by the Debtors pursuant to the Court's Order Pursuant to 11 U.S.C. §§ 105, 363, and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006 (I) Approving Procedures for Sale and Purchase Agreement with Vehicle Acquisition Holdings LLC, a U.S. Treasury-Sponsored Purchaser; (II) Scheduling Bid Deadline and Sale Hearing Date; (III) Establishing Assumption and Assignment Procedures; and (IV) Fixing Notice Procedures and Approving Form of Notice

[Docket Entry No. 274] (the “Order Approving Procedures”). In support of its Limited Objection, Koch respectfully states as follows:

Background

1. On June 1, 2009, the Debtors in the above-captioned case filed their voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. § 101 *et seq.* (as amended, the “Bankruptcy Code”).

2. On June 1, 2009, the Debtors filed their Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), and (m), and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006, to (I) Approve (A) The Sale Pursuant to The Master Sale and Purchase Agreement with Vehicle Acquisition Holdings LLC, A U.S. Treasury-Sponsored Purchaser, Free and Clear of Liens, Claims, Encumbrances, and Other Interests; (B) The Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (C) Other Relief; and (II) Schedule Sale Approval Hearing [Docket Entry No. 92] (the “Motion”).

3. On June 2, 2009, the Court entered its Order Pursuant to Sections 105, 363 and 365 of the Bankruptcy Code and Bankruptcy Rules 2002, 6004 and 6006, (A) Approving Bidding Procedures for the Sale of Substantially all of the Debtors’ Assets, (B) Authorizing the Debtors to Provide Certain Bid Protections, (C) Scheduling a Final Hearing Approving the Sale of Substantially All of the Debtors’ Assets and (D) Approving the Form and Manner of Notice thereof [Docket Entry No. 492] (the “Order”), thereby establishing the procedure for assumption and assignment of Debtors’ contracts to Purchaser¹.

¹ Undefined capitalized terms used herein shall have the same meaning as ascribed to such terms in the Motion.

4. Debtors served Koch with a copy of the Notice dated June 5, 2009. Pursuant to paragraph 7 of the Notice, objections by a Non-Debtor Counterparty to one or more Assumable Executory Contracts, must be asserted within ten (10) days after the date of the Notice.

5. The website provided by Debtors in the Notice states that the aggregate amount necessary to cure all existing defaults for Assumable Executory Contracts with Koch², within the meaning of Section 365 of the Bankruptcy Code is \$580,323.18 (the “Debtors’ Proposed Cure Amount”).

Limited Objection

6. In addition to the Debtors’ Proposed Cure Amount, Koch asserts that it is owed an additional amount not less than \$81,576.29 for certain invoices summarized on the attached Exhibit A and an additional amount not less than \$257,456.62 for certain invoices summarized on the attached Exhibit B for an aggregate total amount not less than \$919,356.09 to cure all existing defaults under the Assumable Executory Contracts as of the Petition Date (the “Koch Cure Amount”). The Koch Cure Amount does not include certain post-petition obligations due and owing from Debtors to Koch in furtherance of Koch’s ongoing obligations to the Debtors.

7. Koch has absolutely no objection to the designation of its contracts with the Debtors as Assumable Executory Contracts.

8. Koch is filing this Limited Objection so as to comply with the Notice, Order and Motion and preserve its rights thereunder, but Koch is simultaneously engaged in business-to-business discussions with the Debtors in an effort to reconcile the cure amount differences.

² According to the website provided by the Debtors, the Assumable Executory Contracts identified by Debtors subject to the Notice includes certain contracts with the following Non-Debtor Counterparties: Uniseal, Inc.; Gibbs Die Casting Corp.; Uniseal Rubber, Inc. and Koch Enterprises, Inc. For the purposes of this objection, the term “Koch” as used herein shall also include each of these above-mentioned Non-Debtor Counterparties.

9. Section 365(b)(1) of the Bankruptcy Code provides:

If there has been a default in an executory contract or unexpired lease of the debtor, the trustee may not assume such contract or lease unless, at the time of assumption of such contract or lease, the trustee -- (A) cures, or provides adequate assurance that the trustee will promptly cure, such default

10. Koch only objects to the Motion on the following grounds:

- a. the Debtors' Proposed Cure Amount is insufficient to cure all existing defaults within the meaning of Section 365 of the Bankruptcy Code; and
- b. the Debtors' Proposed Cure Amount does not include Debtors' post-petition obligations to Koch in furtherance of Koch's ongoing obligations to, and performance for the Debtors.

11. Accordingly, Koch objects to the Debtors' Proposed Cure Amount pursuant Section 365 of the Bankruptcy Code to the extent that the Debtors' Proposed Cure Amount is less than 100% of the actual pre-petition and all post-petition obligations owed by Debtors to Koch.

12. Koch respectfully requests that the requirements of Local Rule 9013-1(b) of the Local Rules for the United States Bankruptcy Court for the Southern District of New York be deemed satisfied.

WHEREFORE, Koch Enterprises, Inc. respectfully requests that the Court enter an Order: (i) sustaining Koch's objections as raised herein and denying the Motion to the extent payment to Koch is an amount less than the Koch Cure Amount plus all post-petition obligations owed by Debtors to Koch in furtherance of Koch's ongoing obligations to the Debtors; and (ii) for all other and further relief that is just and proper.

Dated: June 11, 2009
Indianapolis, Indiana

BARNES & THORNBURG LLP

/s/ Mark R. Owens

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CERTIFICATE OF SERVICE

I, Ethel H. Badawi, hereby certify that I caused a true and correct copy of the foregoing Limited Objection by Koch Enterprises, Inc. to be filed via the Court's CM/ECF System and served this 11th day of June, 2009. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Additionally, this Limited Objection was served upon the following parties at the addresses listed below via Federal Express.

General Motors Corporation
Cadillac Building
30009 Van Dyke Avenue
Warren, Michigan 48090-9025
Attn: Warren Command Center
Mailcode 480-206-114

Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, New York 10153
Attn: Harvey R. Miller, Esq.
Stephen Karotkin, Esq.
Joseph H. Smolinsky, Esq.

U. S. Treasury
1500 Pennsylvania Avenue NW
Room 2312
Washington, D.C. 20220
Attn: Matthew Feldman, Esq.

Cadwalader, Wickersham & Taft LLP
One World Financial Center
New York, New York 10281
Attn: John J. Rapisardi, Esq.

Vedder Price, P.C.
1633 Broadway
47th Floor
New York, New York 10019
Attn: Michael J. Edelman, Esq.
Michael L. Schein, Esq.

Office of the United States Trustee
for the Southern District of New York
33 Whitehall Street
21st Floor
New York, New York 10004
Attn: Diana G. Adams. Esq.

Robert D. Wolford, Esq.
Miller, Johnson, Snell & Cummiskey, PLC
250 Monroe Avenue, N.W.
Suite 800
Grand Rapids, MI 49503

Hon. Robert E. Gerber
United States Bankruptcy Court
Southern District of New York
One Bowling Green, Room 621
New York, NY 10004-1408

Kenneth Eckstein, Esq.
Thomas Moers Mayer, Esq.
Gordon Novod, Esq.
Kramer Levin Naftalis & Frankel LLP
1177 Avenue of the Americas
New York, NY 10036

/s/ Ethel H. Badawi
Ethel H. Badawi

EXHIBIT A

UNISEAL, INC.
 INVOICES MISSING FROM DEBTORS' PROPOSED CURE AMOUNT
 AS OF 06/10/2009

Remit DUNS	PO Number	BOL	Document Date	Due Date	Amount	INV #
GM ARLINGTON TRUCK						
RD006383483	ARR60461	249202	5/13/2009	7/2/2009	3,065.76	214165
RD006383483	ARR60461	249159	5/13/2009	7/2/2009	25,456.32	214227
GM FLINT METAL						
RD006383483	CXR12616	248859	5/7/2009	7/2/2009	1,640.16	213882
GM GRAND RIVERS LANSING						
RD006383483	LAR30656	249480	5/18/2009	7/2/2009	3,345.00	214349
RD006383483	LAR30656	249408	5/18/2009	7/2/2009	1,292.16	214373
RD006383483	LAR30709	249788	5/22/2009	7/2/2009	1,248.00	214651
RD006383483	LAR30709	249968	5/27/2009	7/2/2009	1,248.00	214770
GM LORDSTOWN ASSEMBLY						
RD006383483	LTR43454	247357	4/9/2009	6/2/2009	4,992.00	212467
RD006383483	LTR43554	248566	5/1/2009	7/2/2009	1,353.60	213629
RD006383483	LTR43675	248974	5/11/2009	7/2/2009	646.08	214046
GM ORION ASSEMBLY						
RD006383483	ORR63585	250006	5/28/2009	7/2/2009	13,952.16	214858
RD006383483	ORR63585	249967	5/28/2009	7/2/2009	2,584.32	214871
RD006383483	ORR63585	250019	5/28/2009	7/2/2009	1,725.20	214872
GM PARMA						
RD006383483	PPR79618	248300	4/28/2009	6/2/2009	1,248.00	213370
RD006383483	PPR82004	248696	5/5/2009	7/2/2009	2,496.00	213749
GM PONTIAC METAL FAB						
RD006383483	WHR78806	246636	3/27/2009	5/2/2009	2,307.84	211810
RD006383483	WHR78806	246806	3/31/2009	5/2/2009	6,346.56	212015
RD006383483	WHR78836	249637	5/20/2009	7/2/2009	4,615.68	214477
GM SHREVEPORT						
RD006383483	SHR92595	249824	5/26/2009	7/2/2009	456.00	214707
RD006383483	SHR92629	249854	5/26/2009	7/2/2009	1,557.45	214708

GRAND TOTAL

81,576.29

Gibbs Die Casting Corporation
Invoices Missing from Debtors' Proposed Cure Amount as of 6/1/2009

Vendor Name (as displayed on Claim)	GM Division Plant Code	PO Number	Invoice Number	Shipment ID	Invoice Date	Material Number	Invoice Qty	Unit Price Billed	Invoice Extended Amount
Gibbs Die Casting Corporation	KF	CBH0002L	101737	363342	5/1/09	24203021	1,200	\$1,1487	\$1,378.44
Gibbs Die Casting Corporation	KF	CBH0002M	101738	363342	5/1/09	24202929	3,133	\$0.6256	\$1,960.00
Gibbs Die Casting Corporation	KF	CBH00033	101739	363343	5/1/09	24227931	588	\$3.7495	\$2,204.71
Gibbs Die Casting Corporation	KF	CBH00034	101740	363343	5/1/09	24227935	864	\$3.7266	\$3,219.78
Gibbs Die Casting Corporation	KF	CBH0001J	101747	363334	5/1/09	24205817	800	\$4.6381	\$3,710.48
Gibbs Die Casting Corporation	KF	CBH0001K	101748	363334	5/1/09	08661271	800	\$3.0234	\$2,418.72
Gibbs Die Casting Corporation	KF	CBH00008	101764	363340	5/1/09	08682665	720	\$1.4589	\$1,050.41
Gibbs Die Casting Corporation	KF	CBH0001F	101765	363340	5/1/09	24214002	360	\$2.0725	\$746.10
Gibbs Die Casting Corporation	KF	CBH0001J	101798	363381	5/4/09	24205817	400	\$4.6381	\$1,855.24
Gibbs Die Casting Corporation	KF	CBH0001K	101799	363381	5/4/09	08661271	400	\$3.0234	\$1,209.36
Gibbs Die Casting Corporation	KF	CBH00033	101800	363349	5/4/09	24227931	288	\$3.7495	\$1,079.86
Gibbs Die Casting Corporation	KF	CBH00034	101801	363349	5/4/09	24227935	288	\$3.7266	\$1,073.26
Gibbs Die Casting Corporation	KF	CBH00060	101802	363390	5/4/09	24242678	20	\$20.8058	\$416.12
Gibbs Die Casting Corporation	KF	CBH00068	101803	363390	5/4/09	24248097	20	\$20.9119	\$418.24
Gibbs Die Casting Corporation	KF	CBH0002L	101858	363385	5/5/09	24203021	1,200	\$1.1487	\$1,378.44
Gibbs Die Casting Corporation	KF	CBH00033	101859	363386	5/5/09	24227931	576	\$3.7495	\$2,159.71
Gibbs Die Casting Corporation	KF	CBH00034	101860	363386	5/5/09	24227935	576	\$3.7266	\$2,146.52
Gibbs Die Casting Corporation	KF	CBH0004G	101870	363441	5/5/09	24228537	288	\$6.5829	\$1,895.88
Gibbs Die Casting Corporation	KF	CBH0001J	101880	363422	5/5/09	24205817	800	\$4.6381	\$3,710.48
Gibbs Die Casting Corporation	KF	CBH0001K	101881	363422	5/5/09	08661271	800	\$3.0234	\$2,418.72
Gibbs Die Casting Corporation	KF	CBH00033	101928	363442	5/6/09	24227931	288	\$3.7495	\$1,079.86
Gibbs Die Casting Corporation	KF	CBH00034	101929	363442	5/6/09	24227935	576	\$3.7266	\$2,146.52
Gibbs Die Casting Corporation	KF	CBH0001J	101942	363459	5/6/09	24205817	800	\$4.6381	\$3,710.48
Gibbs Die Casting Corporation	KF	CBH0001K	101943	363459	5/6/09	08661271	800	\$3.0234	\$2,418.72
Gibbs Die Casting Corporation	KF	CBH00033	101956	363466	5/7/09	24227931	576	\$3.7495	\$2,159.71
Gibbs Die Casting Corporation	KF	CBH00034	101957	363466	5/7/09	24227935	576	\$3.7266	\$2,146.52
Gibbs Die Casting Corporation	KF	CBH0002L	101958	363467	5/7/09	24203021	1,200	\$1.1487	\$1,378.44
Gibbs Die Casting Corporation	KF	CBH0004G	101959	363467	5/7/09	24228537	282	\$6.5829	\$1,856.38
Gibbs Die Casting Corporation	KF	CBH0001J	101961	363496	5/7/09	24205817	800	\$4.6381	\$3,710.48
Gibbs Die Casting Corporation	KF	CBH0001K	101962	363496	5/7/09	08661271	800	\$3.0234	\$2,418.72
Gibbs Die Casting Corporation	KF	CBH0000D	101963	363497	5/7/09	08684824	1,134	\$1.7387	\$1,971.69
Gibbs Die Casting Corporation	KF	CBH00004	101964	363497	5/7/09	08679437	900	\$1.6619	\$1,495.71
Gibbs Die Casting Corporation	KF	CBH0001F	101980	363473	5/7/09	24214002	360	\$2.0725	\$746.10

Gibbs Die Casting Corporation
Invoices Missing from Debtors' Proposed Cure Amount as of 6/1/2009

Vendor Name (as displayed on Claim)	GM Division Plant Code	PO Number	Invoice Number	Shipment ID	Invoice Date	Material Number	Invoice Qty	Unit Price Billed	Invoice Extended Amount
Gibbs Die Casting Corporation	KF	CBH00015	101981	363473	5/7/09	24200749	1,260	\$1.3745	\$1,731.87
Gibbs Die Casting Corporation	KF	CBH0001J	101999	363524	5/8/09	24205817	800	\$4.6381	\$3,710.48
Gibbs Die Casting Corporation	KF	CBH0001K	102000	363524	5/8/09	08661271	800	\$3.0234	\$2,418.72
Gibbs Die Casting Corporation	KF	CBH00033	102002	363504	5/8/09	24227931	576	\$3.7495	\$2,159.71
Gibbs Die Casting Corporation	KF	CBH00034	102003	363504	5/8/09	24227935	576	\$3.7266	\$2,146.52
Gibbs Die Casting Corporation	KF	CBH0002L	102004	363503	5/8/09	24203021	1,200	\$1.1487	\$1,378.44
Gibbs Die Casting Corporation	KF	CBH0002M	102005	363503	5/8/09	24202929	3,020	\$0.6256	\$1,889.31
Gibbs Die Casting Corporation	KF	CBH00068	102045	363419	5/11/09	24248097	360	\$20.9119	\$7,528.28
Gibbs Die Casting Corporation	KF	CBH00033	102047	363530	5/11/09	24227931	288	\$3.7495	\$1,079.86
Gibbs Die Casting Corporation	KF	CBH00034	102048	363530	5/11/09	24227935	1,152	\$3.7266	\$4,293.04
Gibbs Die Casting Corporation	KF	CBH0001J	102059	363554	5/11/09	24205817	1,000	\$4.6381	\$4,638.10
Gibbs Die Casting Corporation	KF	CBH0001K	102060	363554	5/11/09	08661271	1,000	\$3.0234	\$3,023.40
Gibbs Die Casting Corporation	KF	CBH0002L	102104	363567	5/12/09	24203021	1,200	\$1.1487	\$1,378.44
Gibbs Die Casting Corporation	KF	CBH00033	102105	363568	5/12/09	24227931	576	\$3.7495	\$2,159.71
Gibbs Die Casting Corporation	KF	CBH00034	102106	363568	5/12/09	24227935	864	\$3.7266	\$3,219.78
Gibbs Die Casting Corporation	KF	CBH00051	102108	363590	5/12/09	24236119	360	\$16.5961	\$5,974.60
Gibbs Die Casting Corporation	KF	CBH00060	102109	363590	5/12/09	24242678	120	\$20.8058	\$2,496.70
Gibbs Die Casting Corporation	KF	CBH0001J	102121	363588	5/12/09	24205817	800	\$4.6381	\$3,710.48
Gibbs Die Casting Corporation	KF	CBH0001K	102122	363588	5/12/09	08661271	800	\$3.0234	\$2,418.72
Gibbs Die Casting Corporation	KF	CBH00033	102155	363600	5/13/09	24227931	288	\$3.7495	\$1,079.86
Gibbs Die Casting Corporation	KF	CBH00034	102156	363600	5/13/09	24227935	576	\$3.7266	\$2,146.52
Gibbs Die Casting Corporation	KF	CBH0001J	102158	363626	5/13/09	24205817	800	\$4.6381	\$3,710.48
Gibbs Die Casting Corporation	KF	CBH0001K	102159	363626	5/13/09	08661271	800	\$3.0234	\$2,418.72
Gibbs Die Casting Corporation	KF	CBH0002L	102160	363605	5/13/09	24203021	1,200	\$1.1487	\$1,378.44
Gibbs Die Casting Corporation	KF	CBH0002M	102218	363632	5/14/09	24202929	4,279	\$0.6256	\$2,676.94
Gibbs Die Casting Corporation	KF	CBH00033	102219	363633	5/14/09	24227931	576	\$3.7495	\$2,159.71
Gibbs Die Casting Corporation	KF	CBH00034	102220	363633	5/14/09	24227935	864	\$3.7266	\$3,219.78
Gibbs Die Casting Corporation	KF	CBH00068	102221	363660	5/14/09	24248097	120	\$20.9119	\$2,509.43
Gibbs Die Casting Corporation	KF	CBH0001J	102222	363654	5/14/09	24205817	800	\$4.6381	\$3,710.48
Gibbs Die Casting Corporation	KF	CBH0001K	102223	363654	5/14/09	08661271	800	\$3.0234	\$2,418.72
Gibbs Die Casting Corporation	KF	CBH0002L	102259	363670	5/15/09	24203021	1,200	\$1.1487	\$1,378.44
Gibbs Die Casting Corporation	KF	CBH00033	102260	363671	5/15/09	24227931	576	\$3.7495	\$2,159.71
Gibbs Die Casting Corporation	KF	CBH00051	102261	363669	5/15/09	24236119	72	\$16.5961	\$1,194.92

Gibbs Die Casting Corporation
Invoices Missing from Debtors' Proposed Cure Amount as of 6/1/2009

Vendor Name (as displayed on Claim)	GM Division Plant Code	PO Number	Invoice Number	Shipment ID	Invoice Date	Material Number	Invoice Qty	Unit Price Billed	Invoice Extended Amount
Gibbs Die Casting Corporation	KF	CBH00068	102262	363669	5/15/09	24248097	40	\$20.9119	\$836.48
Gibbs Die Casting Corporation		CBH0001J	102264	363664	5/15/09	24205817	800	\$4.6381	\$3,710.48
Gibbs Die Casting Corporation		CBH0001K	102265	363664	5/15/09	08661271	800	\$3.0234	\$2,418.72
Gibbs Die Casting Corporation	KG	CBH0004V	102285	363680	5/15/09	24229823	120	\$0.9018	\$108.22
Gibbs Die Casting Corporation		CBH0001J	102318	363704	5/18/09	24205817	800	\$4.6381	\$3,710.48
Gibbs Die Casting Corporation		CBH0001K	102319	363704	5/18/09	08661271	800	\$3.0234	\$2,418.72
Gibbs Die Casting Corporation		CBH00033	102324	363690	5/18/09	24227931	288	\$3.7495	\$1,079.86
Gibbs Die Casting Corporation		CBH00034	102325	363690	5/18/09	24227935	1,152	\$3.7266	\$4,293.04
Gibbs Die Casting Corporation	KF	CBH0002L	102326	363691	5/18/09	24203021	1,200	\$1.1487	\$1,378.44
Gibbs Die Casting Corporation	KF	CBH00060	102329	363719	5/18/09	24242678	60	\$20.8058	\$1,248.35
Gibbs Die Casting Corporation		CBH00033	102357	363716	5/19/09	24227931	288	\$3.7495	\$1,079.86
Gibbs Die Casting Corporation		CBH00034	102358	363716	5/19/09	24227935	576	\$3.7266	\$2,146.52
Gibbs Die Casting Corporation		CBH0001J	102364	363740	5/19/09	24205817	600	\$4.6381	\$2,782.86
Gibbs Die Casting Corporation		CBH0001K	102365	363740	5/19/09	08661271	600	\$3.0234	\$1,814.04
Gibbs Die Casting Corporation		CBH0002L	102408	363751	5/20/09	24203021	2,400	\$1.1487	\$2,756.88
Gibbs Die Casting Corporation		CBH0002M	102409	363751	5/20/09	24202929	3,846	\$0.6256	\$2,406.06
Gibbs Die Casting Corporation		CBH00033	102410	363752	5/20/09	24227931	576	\$3.7495	\$2,159.71
Gibbs Die Casting Corporation		CBH00034	102411	363752	5/20/09	24227935	1,152	\$3.7266	\$4,293.04
Gibbs Die Casting Corporation		CBH00051	102412	363694	5/20/09	24236119	72	\$16.5961	\$1,194.92
Gibbs Die Casting Corporation		CBH00060	102413	363694	5/20/09	24242678	80	\$20.8058	\$1,664.46
Gibbs Die Casting Corporation		CBH0002L	102467	363794	5/21/09	24203021	1,200	\$1.1487	\$1,378.44
Gibbs Die Casting Corporation		CBH00051	102470	363807	5/21/09	24236119	144	\$16.5961	\$2,389.84
Gibbs Die Casting Corporation		CBH00060	102471	363807	5/21/09	24242678	80	\$20.8058	\$1,664.46
Gibbs Die Casting Corporation		CBH0001J	102650	363912	5/28/09	24205817	600	\$4.6381	\$2,782.86
Gibbs Die Casting Corporation		CBH0001K	102651	363912	5/28/09	08661271	600	\$3.0234	\$1,814.04
Gibbs Die Casting Corporation		CBH0001J	102677	363950	5/29/09	24205817	800	\$4.6381	\$3,710.48
Gibbs Die Casting Corporation		CBH0001K	102678	363950	5/29/09	08661271	800	\$3.0234	\$2,418.72
Gibbs Die Casting Corporation	61	CBH00041	101861	363387	5/5/09	24231988	882	\$2.7338	\$2,411.21
Gibbs Die Casting Corporation	61	CBH00041	101927	363433	5/6/09	24231988	1,764	\$2.7338	\$4,822.42
Gibbs Die Casting Corporation	61	CBH00041	102006	363508	5/8/09	24231988	882	\$2.7338	\$2,411.21
Gibbs Die Casting Corporation	61	CBH00041	102046	363529	5/11/09	24231988	882	\$2.7338	\$2,411.21
Gibbs Die Casting Corporation	61	CBH00041	102107	363569	5/12/09	24231988	882	\$2.7338	\$2,411.21
Gibbs Die Casting Corporation	61	CBH00041	102157	363601	5/13/09	24231988	882	\$2.7338	\$2,411.21

Gibbs Die Casting Corporation
Invoices Missing from Debtors' Proposed Cure Amount as of 6/1/2009

Vendor Name (as displayed on Claim)	GM Division Plant Code	PO Number	Invoice Number	Shipment ID	Invoice Date	Material Number	Invoice Qty	Unit Price Billed	Invoice Extended Amount
Gibbs Die Casting Corporation	61	CBH00041	102258	363668	5/15/09	24231988	882	\$2.7338	\$2,411.21
Gibbs Die Casting Corporation	KE	CBH0002N	101756	363339	5/1/09	24203259	1,200	\$0.6326	\$759.12
Gibbs Die Casting Corporation	KE	CBH0002N	101804	363357	5/4/09	24203259	800	\$0.6326	\$506.08
Gibbs Die Casting Corporation	KE	CBH0002N	101849	363393	5/5/09	24203259	1,200	\$0.6326	\$759.12
Gibbs Die Casting Corporation	KE	CBH0004V	101850	363393	5/5/09	24229823	3,888	\$0.9018	\$3,506.20
Gibbs Die Casting Corporation	KE	CBH0002N	101932	363429	5/6/09	24203259	800	\$0.6326	\$506.08
Gibbs Die Casting Corporation	KE	CBH0002N	101979	363472	5/7/09	24203259	800	\$0.6326	\$506.08
Gibbs Die Casting Corporation	KE	CBH0002N	102025	363506	5/8/09	24203259	800	\$0.6326	\$506.08
Gibbs Die Casting Corporation	KE	CBH0002N	102044	363547	5/11/09	24203259	1,200	\$0.6326	\$759.12
Gibbs Die Casting Corporation	KE	CBH0002N	102128	363566	5/12/09	24203259	400	\$0.6326	\$253.04
Gibbs Die Casting Corporation	KE	CBH0004V	102129	363566	5/12/09	24229823	3,888	\$0.9018	\$3,506.20
Gibbs Die Casting Corporation	KE	CBH0002N	102169	363617	5/13/09	24203259	800	\$0.6326	\$506.08
Gibbs Die Casting Corporation	KE	CBH0002N	102252	363647	5/14/09	24203259	1,200	\$0.6326	\$759.12
Gibbs Die Casting Corporation	KE	CBH0002N	102283	363675	5/15/09	24203259	1,600	\$0.6326	\$1,012.16
Gibbs Die Casting Corporation	KE	CBH0004V	102284	363675	5/15/09	24229823	3,888	\$0.9018	\$3,506.20
Gibbs Die Casting Corporation	KE	CBH00024	102328	363705	5/18/09	24214391	1,008	\$1.8679	\$1,882.84
Gibbs Die Casting Corporation	KE	CBH0002N	102372	363715	5/19/09	24203259	1,200	\$0.6326	\$759.12
Gibbs Die Casting Corporation	KE	CBH0002N	102415	363758	5/20/09	24203259	1,600	\$0.6326	\$1,012.16
Gibbs Die Casting Corporation	KE	CBH00024	102473	363815	5/21/09	24214391	1,008	\$1.8679	\$1,882.84
Gibbs Die Casting Corporation	KE	CBH00041	102694	363942	5/29/09	24231988	882	\$2.7338	\$2,411.21
								TOTAL	\$257,456.62